

EXHIBIT E

2 pages

PR#9833

ZHANG, HAILIN

1/16/2008

1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.
W. A. DREW EDMONDSON, in his
capacity as ATTORNEY GENERAL
OF THE STATE OF OKLAHOMA and
OKLAHOMA SECRETARY OF THE
ENVIRONMENT C. MILES TOLBERT,
in his capacity as the TURSTEE
FOR NATURAL RESOURCES FOR
THE STATE OF OKLAHOMA,

Plaintiffs,

vs.

05-CV-0329 GKF-SAJ

TYSON FOODS, INC., TYSON
POULTRY, INC., TYSON CHICKEN,
INC., COBB-VANTRESS, INC.,
AVIAGEN, INC., CAL-MAINE FOODS,
INC., CAL-MAINE FARMS, INC.,
CARGILL, INC., CARGILL TURKEY
PRODUCTION, LLC, GEORGE'S, INC.,
GEORGE'S FARMS, INC., PETERSON
FARMS, INC., SIMMONS FOODS, INC.,
and WILLOW BROOK FOODS, INC.,

Defendants.

VIDEO DEPOSITION OF HAILIN ZHANG, Ph.D.
TAKEN ON BEHALF OF THE DEFENDANTS
JANUARY 16, 2008, BEGINNING AT 9:00 A.M.
IN OKLAHOMA CITY, OKLAHOMA

REPORTED BY: Laura L. Robertson, CSR, RPR

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43

1 **A.** No, I'm not aware of any.

2 **Q.** We have talked about the cost of
3 transporting it and some numbers that you saw quite
4 some time back. Is there any such alternative use
5 within what you would consider a reasonable distance
6 to transport poultry litter from the Illinois River
7 Watershed?

8 **A.** Well, Illinois River Watershed is a big
9 watershed. I don't know where to start. But in my
10 opinion, you should not transport more than 100 miles
11 from the source. If you do, you may lose the value of
12 that.

13 **Q.** And are you aware of any alternative sources
14 of, or uses of poultry litter within 100 miles of that
15 area, as you sit here right now? I know you haven't
16 researched it.

17 **A.** Well, there are plenty of lands that
18 actually need phosphorous, even in the Illinois River
19 Watershed, or surrounding areas. They just need to
20 test the soil, find out where the phosphorous is.

21 **Q.** So you believe that there are within the
22 Illinois River Watershed other -- let's use a
23 hypothetical. If I'm a poultry grower and my nutrient
24 management plan does not allow me to put poultry
25 litter on my particular farm, are you telling me that